

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF PUERTO RICO**

IN THE MATTER OF

WANDA M REYES VELAZQUEZ

Debtor

FIRSTBANK Puerto Rico

WANDA M REYES VELEZQUEZ
JOSE CARRION MORALES
Chapter 13 – Trustee
Respondent(s)

CASE NO: 11-000850 (ESL)

CHAPTER 13

(X) reply to an answer Movant
to a motion under 11 USC §362

**INFORMATIVE MOTION ON OBJECTION TO CONFIRMATION AND REQUEST FOR THE
OBJECTION TO BE HELD IN ABIANCE**

TO THE HONORABLE COURT:

Comes now FIRSTBANK PUERTO RICO through its undersigned counsel and respectfully alleges and prays:

I. INTRODUCTION.

1. That this Honorable Court has jurisdiction under 28 USC §1334 on Jurisdiction, 28 USC §1408 on Venue, 11 USC §1325 (A)(5)(B) and §1325(a)(5)(iii), §1326(a)(1) and §361.

II. FACTS.

2. Debtor(s) filed a Chapter 13 of the Bankruptcy Code on February 3, 2011.

3. Movant objected the prior plan dated March 15, 2011. *Dck no 13* And, although an amended plan dated march 23, 2011 was filed, *Dck no 19*, the amended plan “*per se*” does not take care of Movant’s objection under docket no. 19, as no evidence of the acquisition of an insurance policy has been submitted to this secured lien claim creditor: - please refer to the notes on the 341 meeting of creditors “*submit new insurance quote*”.

4. For the reasons state hereinbefore Movant request for its objection to the confirmation of the case be held in ambiance to be heard on the next regular confirmation hearing scheduled by this honorable court.

WHEREFORE, FirstBank Puerto Rico respectfully requests from this Honorable Court to held the objection in abeyance until confirmation hearing.

CERTIFICATE OF SERVICE

I hereby certify that on this same date a true and correct copy of the present motion was sent by the CM/ECF System to the authorized address on docket to: - the Chapter 13 Trustee; - to the Attorney for the Debtor(s), MARILYN VALDEZ ORTEGA; - to the creditors listed under the List of Creditors, and by regular mail to Debtor(s) at the address on record, WANDA M REYES VELEZQUEZ, at 380 BELLEVUE ST, OBRERO WARD, SANTURCE, PUERTO RICO 00915.

In San Juan, Puerto Rico, the 24st of March, 2011.

By: //s// María M. Benabe Rivera
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